

Meeting Minutes
Inter Agency Management Integration Team (IAMIT)
EPA Conference Room
712 Swift Blvd., Richland
April 23, 1996

Appvl.: *C. A. Hansen* Date: 5/28/96
For C. A. Hansen, RL
IAMIT Representative

Appvl.: *D. R. Sherwood* Date: 5/28/96
D. R. Sherwood, EPA
IAMIT Representative

Appvl.: *M. A. Wilson* Date: 5/28/96
M. A. Wilson, Ecology
IAMIT Representative

Prepared by *R. D. Morrison* Date: 5/28/96
Appvl.: R. D. Morrison
Westinghouse Hanford Company

Attendees

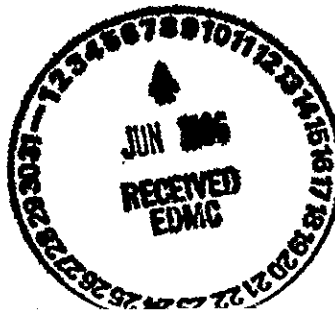
Alexander, S. M.	Ecology	B5-18*	Murphy, J. L.	RL	H0-12
Arnold, L. D.	WHC	B2-35	Sanders, G. H.	RL	A5-15*
Clendenon, R. L.	RL	H0-12	Sherwood, D. R.	EPA	B5-01*
Dirkes, R. L.	PNNL	K6-75	Sinton, G. L.	RL	S7-55
Dougherty, D. S.	Ecology	B5-18	Randolph, K. K.	RL	A7-75
Faulk, D. A.	EPA	B5-01	Rasmussen, J. E.	RL	A5-15
Hansen, C. A.	RL	S7-41*	Stone, A. B.	Ecology	B5-18
Harper, R. B.	Ecology	B5-18	Thompson, K. M.	RL	H0-12
Holland, D. P.	Ecology	B5-18	Wanek, D. M.	RL	H0-12
Jackson, D. E.	RL	A5-15	Wilson, M. A.	Ecology	B5-18*
Lundstrom, D.	Ecology	B5-18*	Yerxa, J. K.	RL	A7-75
Miera, F. R.	RL	A5-15*	Zeisloft, J. H.	RL	H0-12
Morrison, R. D.	WHC	B2-35	EPIC		H6-08*
Murphy, A. Q.	RL	A7-29*			

cc:

Calapristi, F. T	WHC	B2-35*	Piper, L. L	RL	A5-11
Mecca, J. E.	RL	R3-79	Roeder-Smith, L	JAC	

* W/Attachments

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**Inter Agency Management Integration Team
EPA Conference Room
712 Swift Blvd., Richland
April 23, 1996**

IAMIT Representatives: Doug Sherwood, Mike Wilson, Charlie Hansen
WHC Tri-Party Agreement Integration: Larry D. Arnold
Recorder: Ron D. Morrison

1. Approval of March Meeting Minutes

The March meeting minutes were approved by the IAMIT members.

2. Draft MOU Between EPA and Ecology

EPA provided draft copies of the second version of the Memorandum of Understanding between Washington State Department of Ecology and U.S. Environmental Protection Agency Region 10 concerning the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) (Attachment 1). EPA went on to state that one minor issue remains to be finalized between the EPA and Ecology with final approval expected during the week ending May 3, 1996.

3. Placement of the Tri-Party Agreement on the Internet

WHC reported that it has been estimated that placement of the Tri-Party Agreement on the Internet would require approximately \$4,000 and that funding for this action has been identified.

The DOE asked the IAMIT members if extensive use of the Internet was advisable in an effort save costs and provide valuable communication. The general consensus was that use of the Internet was appropriate and perhaps even essential.

The IAMIT members requested further information on the status and functioning of the "Hanford Homepage" currently residing on the Internet. The DOE agreed to provide this information.

4. Status of the Tri-Party Agreement Community Relations Plan

The EPA presented a draft schedule for completing the revision and finalization of an updated Community Relations Plan (CRP) (Attachment 2). Some highlights of the proposed changes in the draft CRP are:

Addition of biannual meetings on the Hanford budget

Elimination of public comment periods for RCRA/CERCLA work plans

Removing requirements for microfilm copies of documents in the Administrative Records and Public Information Repositories

The Hanford Advisory Board (HAB) has requested that requirements be added to the CRP regarding the funding of the HAB. It was noted that this change will still require additional work between the DOE, EPA and Ecology to resolve.

Another issue explained to the IAMIT members was the coordination of public review periods for the revised CRP and proposed changes to Section 10 of the Tri-Party Agreement Action Plan.

Enforceability of the CRP has also been raised as an issue to be investigated with the legal staffs of the DOE, EPA and Ecology. This question, of enforceability, has ramifications to proposed changes to both the CRP and Section 10 of the Tri-Party Agreement Action Plan.

The DOE expressed that there are additional issues which will need to be addressed. The EPA and Ecology requested specific comments on the April 3, 1996 draft of the CRP (provided via letter dated April 9, 1996 [Attachment 3]) by April 26, 1996 in order to prepare for a planned meeting of the HAB ad hoc committee on May 2, 1996. The DOE agreed to provide comments by April 26, 1996. Additionally the EPA requested any outstanding issues from any party be identified as soon as possible in order to prepare for the HAB ad hoc meeting.

The Public Involvement Officers for the DOE, EPA and Ecology agreed to review the status of the CRP with the IAMIT at the May 28, 1996 IAMIT meeting.

5. Timeline for Regulator Involvement in the MYPP, BEMR and Budget Involvement Process

The DOE presented and discussed "Planning/Budget Integration Cycle and DOE Planning/Budget Process Flow" charts (Attachments 4 and 5) after which the DOE opened the presentation to questions and answers.

The EPA stated that perhaps the public's expectations are too high related to outyear budget planning activities. The agencies may need to communicate that the process is a more gradual, evolving one and that all questions/concerns about the out years cannot be resolved immediately. The DOE concurred in the importance of communicating that the budget is a very fluid process and subject to many changes and influences.

Ecology expressed that the exchange of budget information at the Project Manager level was critical to the success of the planning process. The DOE stated that a better definition of the level of involvement must be developed in order to set the standard level of involvement.

It was pointed out that Ecology has proposed language dealing with the appropriate level of involvement and this should be addressed and factored into any process developed.

The DOE indicated the desire to inform the EPA and Ecology prior to addressing the HAB on the budget. This was generally accepted as a good practice with the exception that should it result in delays in the process, prior consultation with EPA and Ecology was not absolutely necessary.

The DOE proposed that continued discussions be held with the EPA and Ecology to further define the details of the process. The DOE took the action to set up further meetings.

6. Postponement of the Tank Waste Remediation System (TWRS) April Milestone Review Meeting

The DOE, EPA and Ecology approved an Agreement to postpone the scheduled April 1996 TWRS milestone review meeting (Attachment 6).

7. Oregon Department of Energy Participation in IAMIT and Milestone Review Meetings

Ecology opened the discussion with a request by the Oregon Department of Energy to be allowed to attend the IAMIT and Milestone Review Meetings as observers only.

Due to the sensitive nature of dispute or enforcement discussions occurring in IAMIT meetings it was considered inappropriate to include groups outside of the three Parties in the IAMIT Meetings.

A concern was raised that the inclusion of other groups in the IAMIT meetings could set a precedent for the attendance of multiple groups.

The DOE proposed that the Oregon Department of Energy be allowed to attend the Tri-Party Agreement Monthly Milestone Reviews as an appropriate forum for receiving information. The EPA and Ecology concurred that this may be appropriate.

The DOE, EPA and Ecology agreed to include the Oregon Department of Energy on the distribution of IAMIT and Tri-Party Agreement Monthly Milestone Review minutes.

The DOE, EPA and Ecology further agree to invite the Oregon Department of Energy to attend ongoing M-33 Negotiation Update Sessions.

8. The Five Year Review of the Tri-Party Agreement

The DOE, EPA and Ecology agreed to further extend the completion of the Five Year Review (reference: Tri-Party Agreement, Article XLIII, Paragraph 132).

9. Discuss and/or Approve/Disapprove Change Requests

- The following change requests were approved:
 - M-26-96-01 Revise Tritium Treatment Report to Biennial (Attachment 7)
 - M-15-96-01 Columbia River Comprehensive Impact Assessment (Attachment 8)
- Discussion of change request M-41-96-02, Revise M-41 Milestones/Flammable Gas Issue, was deferred. The DOE and Ecology agreed that the results of the recently received LANL Flammable Gas Safety Report must be reviewed before any action should be taken on the subject change request. The DOE and Ecology agreed to extend the dispute regarding the M-41 (SST Interim Stabilization) milestones to June 5, 1996 (Attachment 9).

10. ER Code of Accounts

The DOE provided a presentation on a "Code of Accounts" (Attachment 10). This system will be a new way of tracking costs which is planned to be implemented in FY 1997.

The IAMIT members expressed endorsement of the new system and encouraged it's implementation.

The DOE invited EPA and Ecology to send representatives to training sessions on the Code of Accounts. The DOE took the action to provide a schedule of training opportunities to the EPA and Ecology.

AGENDA

IAMIT MEETING
 APRIL 23, 1996
 EPA CONFERENCE ROOM
 712 SWIFT BLVD., STE. 5
 8:30 AM - 12:00 AM
 (CHAIRPERSON: M. A. WILSON)

- 8:30 am APPROVAL OF MARCH MEETING MINUTES
- 8:35 am DRAFT MOU BETWEEN EPA AND ECOLOGY (D. SHERWOOD, M. WILSON)
- 8:45 am PLACEMENT OF TPA ON INTERNET (G. SANDERS)
- 9:00 am STATUS OF THE COMMUNITY RELATIONS PLAN (J.YERXA, L.DAVIES, D.FAULK)
- 9:30 am OREGON DEPT. OF ENERGY PARTICIPATION IN IAMIT AND MILESTONE REVIEW MEETINGS (M.A. WILSON)
- 10:00 am BREAK
- 10:15 am TIMELINE FOR REGULATOR INVOLVEMENT IN THE MYPP, BEMR, AND BUDGET INVOLVEMENT PROCESS (C. HANSEN, A. MURPHY)
- 10:45 am DISCUSS/APPROVE CHANGE REQUESTS
 - o M-26-96-01 Revise Tritium Treatment Report to Biennial (G. L. Sinton, M. Selby)
 - o M-41-96-02 Revise M-41 Milestones/Flammable Gas Issue (J.M. Clark, M. Wilson)
 - o M-15-96-01 Columbia River Comprehensive Impact Assessment (R. Holten, R.K. Stewart)
- 11:05 am ER CODE OF ACCOUNTS (R. HOLTEN, D. WANEK)
- 12:00 am ADJOURN

ATTENDEES

INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

APRIL 23, 1996

EPA CONFERENCE ROOM
712 SWIFT BLVD, RICHLAND

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
<u>RD MORRISON</u>	<u>WDC/TPAI</u>	<u>B2-35</u>	
<u>S.M. Alexander</u>	<u>Ecology</u>	<u>B5-18</u>	✓
<u>L. ARNOLD</u>	<u>WDC/TPAI</u>	<u>B2-35</u>	✓
<u>D. JACKSON</u>	<u>DOE-RL</u>	<u>A5-15</u>	
<u>Felix Miera</u>	<u>DOE/EAP</u>	<u>A5-15</u>	✓
<u>Dave Lundstrom</u>	<u>Ecology</u>	<u>B5-18</u>	✓
<u>Doug Sherwood</u>	<u>EPA</u>	<u>B5-01</u>	✓
<u>GEORGE SANDERS</u>	<u>DOE/RL/EAP</u>	<u>A5-15</u>	✓
<u>MIKE WILSON</u>	<u>Ecology</u>		✓
<u>Alice Murphy</u>	<u>DOE</u>	<u>A7-29</u>	✓
<u>Charles Hansen</u>	<u>DOE-RL</u>	<u>57-41</u>	✓
<u>JUDY YERKES</u>	<u>DOE-RL</u>	<u>A7-75</u>	
<u>Rob Harper</u>	<u>Ecology</u>		
<u>Jenniss Faulk</u>	<u>EPA</u>	<u>B5-01</u>	

ATTENDEESINTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

APRIL 23, 1996

EPA CONFERENCE ROOM
712 SWIFT BLVD, RICHLAND

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
Karen Raulof	DOE/RL/OEA		
Jim Rasmussen	DOE/RL/EAP		
Greg Sinton	DOE/RL/WPD-LEP		
Tamie Zeisler	DOE/RL/EAP+ER		
Alex Steele	Wash Dept of Ecology		
DAVE DOUGHERTY	ECOLOGY		
K. Michael Lazenby	DOE/RL/EAP		
Bob Stewart	DOE-RL/AME		
Roger L. Dirker	PNNL/CRLA		
David Holland	Ecology		
JOHN MURPHY	DOE/RL/AME		
Donna Warner	DOE/RL/AME	HO-12	
RON CLENDENON	DOE/RL/AME		
MIKE FOX	BH1 ER		

DRAFT

MEMORANDUM OF UNDERSTANDING
between
WASHINGTON STATE DEPARTMENT OF ECOLOGY
and
U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 10
concerning
HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
(Tri Party Agreement)

I. INTRODUCTION

- A. On February 23, 1996, the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) executed Amendment 6 to the Tri-Party Agreement (TPA). Amendment 6 included changes made to achieve a single regulator approach at Hanford.
- B. Pursuant to the TPA, as amended, EPA and Ecology are entering into this Memorandum of Understanding (MOU) to further describe lead regulatory agency (LRA) responsibilities and the circumstances under which the LRA and non lead agency will interact and coordinate activities. These include instances where:
1. The LRA has requested the assistance or involvement of the non lead agency;
 2. Ecology lacks legal authority to approve or require action, such as approval of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) remedial action;
 3. The non lead agency has a mandatory legal obligation or duty, such as under a permit;
 4. EPA is the LRA and Ecology concurrence is sought for a CERCLA remedial action.
- C. Except in certain limited situations, either EPA or Ecology will serve as LRA for each operable unit, treatment, storage and disposal (TSD) group/unit, and milestone, and the non lead agency will generally not be involved. The non lead agency will not assign staff to oversee work at that operable unit or TSD, even though it may have legal authority to do so.

- D. EPA and Ecology will designate a LRA for each operable unit and each milestone in accordance with section 5.6 of the TPA Action Plan. Ecology will be LRA for all TSD units and groups.
- E. When the LRA requests the assistance or written concurrence of the non lead agency, the non lead agency may concur, consult with, or otherwise assist the LRA as appropriate and as resources allow. In the event of such a request, EPA and Ecology will confer to determine how such assistance will be provided. Ecology may also request the exercise of applicable EPA enforcement authority.

II. CERCLA IMPLEMENTATION

A. Ecology Lead

1. Under Section 120 of CERCLA, EPA and DOE are required to review the results of the remedial investigation and feasibility study (RI/FS) and select the remedial action. If EPA and DOE are unable to agree, EPA selects the remedial action.
2. To satisfy statutory requirements in a manner consistent with the LRA system, EPA and Ecology agree to proceed as follows at CERCLA sites where Ecology is the lead.
 - a. EPA will be involved to the extent necessary to satisfy remedy selection statutory obligations. EPA will generally not be involved in all other matters concerning the operable unit. EPA involvement at these operable units will generally be limited to milestone briefings at specific phases of the project in order to ensure sufficient EPA familiarity with the project and to resolve issues so that EPA will be prepared to approve Records of Decisions (RODs) for remedial action. This includes RODs for interim remedial actions (IRAs), and issuance of a ROD amendment or explanation of significant difference (ESD).
 - b. Ecology will work with EPA to address/resolve any EPA issues or concerns before RODs for remedial action are approved by signature. If EPA and Ecology cannot agree such that EPA is willing to sign the ROD, Energy will be notified and any dispute will be addressed in accordance with the TPA Part 3 Dispute

Resolution procedures, which provide for the participation of all three TPA parties.

- c. EPA will generally not be involved in overseeing implementation of RODs at Ecology lead sites. No implementation briefings are required, though EPA may request status reports from time to time.
- d. EPA will generally not be involved in any other response actions taken or proposed at Ecology lead sites. EPA will generally not participate in the review of engineering evaluation/cost analyses (EE/CAs) or in the approval of expedited response actions (ERAs).

B. EPA Lead

- 1. Ecology involvement at these sites will essentially be limited to remedial action milestone briefings. These briefings will be used to provide Ecology with information on the proposed remedial action and to determine Ecology's willingness to concur on the ROD. Ecology may choose not to concur on the ROD. Ecology may request status reports on ROD implementation from time to time

C. Joint Lead Sites

- 1. EPA and Ecology will assume primary oversight responsibilities for activities at these sites according to each agency's role and responsibilities at the site. The agencies will conduct regulatory oversight activities in a manner that directs resources to complimentary rather than redundant activities.

D. Milestone Briefings

- 1. The milestone briefings include:
 - a. PROJECT PLANNING BRIEFING - The LRA will present the conceptual project model and outline how the project will be managed, including plans for investigating the site and for conducting ERAs. The non lead agency will provide input, as appropriate, regarding technical, legal, and resource implications. The LRA will prepare the informational

briefing package. Based on prior project knowledge/experience, the non lead agency may agree to forego this briefing.

- b. PROPOSED PLAN BRIEFING - Before issuance of the proposed plan, a briefing by the LRA will be provided to determine the non lead agency's willingness to approve/concur, and if not, to identify issues.
- c. REMEDY SELECTION BRIEFING - Following the proposed plan and response to public comment, a follow-up briefing will be held, if comments or new information warrant reconsideration of the proposed remedy. The LRA will prepare the briefing package.

E. Briefings Procedure

- 1. NOTIFICATION - The LRA will notify the non lead agency point of contact approximately one month before the briefings. The pre proposed plan briefing will be a "peer review meeting." Upon notification, the non lead agency designates a site team or individual (for EPA it may include project managers, an attorney, and others; for Ecology it may include the Project Manager, unit managers and/or functional team leaders, the appropriate section manager, and an attorney), to shepherd the substantive and administrative elements of the remedy selection process through to conclusion and selection/concurrence by the authorized agency manager (for EPA it is the Regional Administrator (RA); for Ecology it is the Program Manager, Nuclear Waste Programs).
- 2. The LRA project manager will coordinates briefing meeting dates with the non lead agency. The LRA project manager will provide a briefing package to the non lead agency site team or individual two weeks before the meeting.

The EPA point of contact for logistics is the Office Manager, Hanford Project Office.

The Ecology points of contact for logistics are: (1) the Kennewick Office, Perimeter Section Secretary, and (2) the Kennewick Office, 200 Area Section Secretary.

3. PRE-PROPOSED PLAN BRIEFINGS - The proposed plan strategy should represent the LRA and DOE's best effort at developing an approach that meets technical, legal and policy objectives. These briefings are an opportunity for peer and management review to identify any problems with the strategy, provide solutions, and ensure greater consistency with sites involving similar media and contaminants. The proposed plan phase is initiated with an internal peer review meeting and concludes at the end of the public comment period.
- a. The LRA regulatory agency project manager will provide a 2-3 page briefing package, plus figures and tables, approximately 2 weeks before the peer review meeting. The briefing package will describe the site characteristics and need for action; applicable, relevant and appropriate requirements (ARARs); remedial action objectives (RAOs); alternatives considered and their respective costs; technical and policy issues; operating facility description; pathways/receptors; Model Toxics Control Act (MTCA) and CERCLA cleanup levels; the proposed remedy; and rationale for selection of the proposed remedy as related to CERCLA remedy selection criteria.
 - b. The LRA project manager will present the preferred alternative at the peer review meeting. In addition to information provided in the briefing package, the LRA project manager and DOE should address:
 - ♦ Comparison - to sites with similar media (e.g., soils vs. sediments), contaminants (e.g., polychlorinated biphenyls, metals, etc.), geographic settings;
 - ♦ Other agency involvement - state, local, tribes, natural resource trustees;
 - ♦ Community input - Hanford Advisory Board, interest groups, sensitive populations.

4. The non lead agency site team/individual may indicate general agreement on the proposed plan strategy at the peer review meeting, but final approval cannot be obtained until non lead agency management is briefed up through the agency's authorized decision maker (for EPA it is the RA, for Ecology it is the Program Manager, Nuclear Waste Programs). Alternatively, the LRA regulatory agency RPM project manager, DOE and the non lead agency site team/individual may revise the strategy as appropriate in response to issues raised at the peer review meeting.
5. DOE and the LRA regulatory agency RPM project manager will draft the proposed plan for review by the non lead agency site team/individual. The non lead agency will provide comments on the proposed plan to the LRA project manager. Non lead agency comments should focus on major policy and technical issues. When the proposed plan is revised in response to non lead agency comments, an EPA agency upper management briefing will be scheduled (to include the Hanford Office Unit Manager, Office Director, and RA, as appropriate). The EPA site team will schedule the briefing of EPA upper management. Where Ecology is the LRA, the Ecology project manager will be invited to attend and jointly present the proposed plan with the EPA site team.
6. Once EPA approval is obtained, DOE will issue the proposed plan. Where Ecology is the LRA, DOE and Ecology will conduct any public meetings on the proposed plan. EPA will attend the public meeting and may participate, as appropriate, since EPA is required by statute to select the remedy along with DOE. Where EPA is the LRA, Ecology will generally not be a formal participant in the public meeting, but may attend as a regulatory agency.
7. DECISION DOCUMENT - After the end of the public comment period, the LRA project manager and DOE will consolidate and summarize the written and oral public comment on the proposed plan. The LRA project manager will contact the non lead site team/individual and discuss the substance of public comment and determine whether any changes are warranted to the preferred alternative.

8. If no substantive changes to the Proposed Plan are warranted, the LRA project manager will proceed to draft the ROD. For EPA lead sites, Ecology concurrence would be expected without further briefing. For Ecology lead sites given statutory requirements, the Ecology project manager and DOE will submit an advanced draft of the ROD to EPA site team for review and comment. EPA will provide comments on the ROD to Ecology. Once EPA comments have been incorporated, the EPA site team will request via memo the RA's approval by signature on the ROD without further additional briefing.
9. If substantive changes to the preferred remedy are warranted, a draft copy of the ROD will be provided to the non lead agency for review. Depending on the extent of modifications necessary, an additional briefing of LRA management may take place. Non lead agency attendance at subsequent briefings is not necessary.
10. The LRA will provide a copy of the final ROD to the non lead agency.

F. National Priority List (NPL) Deletion

1. The criteria for deleting sites from the NPL is set forth at 40 C.F.R. § 300.66(c)(7). The deletion process may begin after approval of the Close Out Report by the EPA RA if EPA and Ecology concur that deletion should proceed, and after RA approval of at least one five-year review at those sites which require five year reviews.
2. Ecology may request that EPA consider deleting a site, or EPA may initiate the process on its own initiative. To assist in making the decision whether to proceed, the LRA will provide a deletion milestone briefing for the non lead agency. During the briefing, the LRA will provide, as appropriate, information on: site background, investigations, response actions taken, performance of remedy in meeting cleanup goals, operation and maintenance activities, results of "5 year reviews," and community relations activities. The LRA will also summarize how the site satisfies deletion criteria. Based on prior project knowledge/experience, the non lead agency may agree to forego this briefing.

3. EPA will retain responsibility for providing notice to the tribes and to the natural resource trustees, and for publishing the "Notice of Deletion." For those sites where Ecology is the LRA, DOE and Ecology will assist by providing EPA with documentation necessary to support deletion. Although the types and/or titles of documents may vary depending on the types of response (e.g., remedial action, removal, no-action), the following provides an initial list of documents that should be considered in preparing a deletion docket.
 - remedial investigation reports
 - feasibility study reports
 - action memoranda for removals
 - On Scene Coordinator (OSC) reports for removals
 - RODs for each operable unit, including any ROD amendments or Explanation of Significant Differences
 - design plans and specifications
 - data (including quality assurance/quality control) confirming that the remedial action undertaken achieved final cleanup goals
 - construction inspection reports
 - documentation of state concurrence on deletion
 - operation and maintenance plan
 - close out report
 - initial five year review report, where appropriate
 - community relations plan
 - transcripts from public meetings addressing the adequacy of the remedy or public sentiment regarding the proposed deletion
 - responsiveness summary for Notice of Intent to Delete
 - bibliography of documents
4. All pertinent information supporting EPA's deletion recommendation will be placed in the site deletion docket.
5. The LRA will draft a responsiveness summary in response to comments received on the Notice of Intent to delete. EPA will finalize the summary and will be responsible for publishing a final Notice of Deletion in the Federal Register if EPA and Ecology decide to proceed after considering

public comment. EPA will also issue a fact sheet announcing deletion of the site from the NPL.

6. These same procedures apply to partial deletion actions.

III. HAZARDOUS WASTE MANAGEMENT ACT (HWMA) AND RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) IMPLEMENTATION

- A. Ecology will be the LRA for all TSD units and groups. In accordance with the single regulator principle and as a matter of prioritizing its workload, EPA will generally NOT be devoting resources to duplicate or concur on state HWMA regulatory work. EPA will not oversee activity subject to state rules, including rules that have not yet been authorized but which are substantially equivalent to RCRA. Therefore, EPA will not be routinely co-signing or concurring on state documents. Ecology will be the single point of contact, regulator and decision maker for all activities subject to the HWMA.
- B. EPA will fulfill any mandatory obligations it has under the EPA issued Hazardous and Solid Waste Amendments (HSWA) permit. In addition, upon the request of Ecology, or as otherwise appropriate as part of its state program oversight responsibilities, EPA may participate in other matters as resources allow. In the event that EPA involvement in a specific matter is requested by Ecology or is otherwise necessary, Ecology will brief EPA, and EPA will become involved to the extent necessary to help resolve the specific matter.
- C. In fulfilling its responsibilities, EPA will rely to the extent it can on the work done by Ecology as the LRA. Briefings as well as planning meetings may be used to facilitate EPA action. EPA and Ecology will conduct periodic planning meetings to discuss issues/future site regulatory needs, and the respective Ecology/EPA roles and responsibilities. Any disputes concerning RCRA that arise that cannot be resolved at these meetings may be referred by either EPA or Ecology for resolution pursuant to Article XXVI of the TPA.
- D. RCRA matters for which state does not have equivalent authority
 1. If there are any RCRA matters for which the state does not have substantially equivalent state regulations, Ecology will remain the LRA and point of contact for DOE, but may request EPA regulatory action. If EPA takes action, it will rely to the

extent it can on the work done by Ecology as the LRA. Briefings as well as planning meetings may be used to facilitate EPA action.

IV. GENERAL PROVISIONS

- A. Both Ecology and EPA will continue to be involved in budget matters (implementation of TPA paragraphs 148 & 149), revisions to the TPA legal agreement or Action Plan, modifications of major milestones, site scoping, and delineation of operable units/projects.
- B. EPA and Ecology will continue to inform each other as early as possible of significant issues that arise, and of approaches they may take as LRA that may be inconsistent with or otherwise affect work at sites for which they are not the LRA.
- C. Changes to the TPA and to major milestones require the signature of all three parties (in accordance with Section 12 of the TPA Action Plan). All other changes may be executed by DOE and the LRA without the participation of the non lead agency. The LRA will provide courtesy advance notification to the non lead agency of both proposed and final changes of any significance. If there are different regulatory leads for different components of a milestone (and in the few situations where EPA and Ecology serve as joint regulatory lead), the concurrence of all three parties will be required.
- D. Nothing in this agreement alters the statutory authorities or responsibilities of EPA, the Department of Ecology or the Department of Energy, including EPA's RCRA program oversight and enforcement authorities.
- E. Nothing in this document is intended to affect any provision or requirement of CERCLA, RCRA, the HWMA, the National Contingency Plan or applicable EPA and Ecology rules policy or guidance. This document is intended to benefit only EPA and Ecology. It extends no benefits or rights to any party not a signatory to this MOU.
- F. This MOU may be modified, extended or terminated by mutual consent of Ecology and EPA. It may also be terminated with 60 days written notice by either Ecology or EPA.
- G. The terms of this MOU shall not be construed as a waiver of any right, privilege or authority on the part of any of the Parties.

V. EFFECTIVE DATE

- A. This MOU will become effective upon the date of signature by both Parties and will continue in effect unless modified or terminated.

Randall F. Smith, Director
Office of Environmental Cleanup
EPA Region 10

Date

Michael Bussell, Director
Office of Chemical and Waste Management
EPA Region 10

Date

Mike Wilson, Program Manager
Nuclear Waste Program
Washington State Department of Ecology

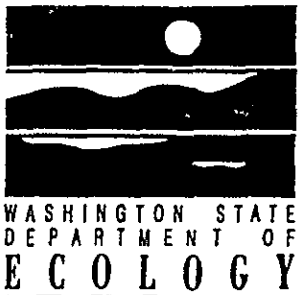
Date

Dan Silver, Assistant Director
Waste Management Division
Washington State Department of Ecology

Date

TRI-PARTY AGREEMENT
Community Relations Plan
Timetable
April to July 1996

April 22	Conference Call with HAB Ad Hoc Committee
April 23	IAMIT Briefing
Week of 4/22	Revise CRP based on Ad Hoc Committee comments
May 2	HAB PI Ad Hoc Committee meeting on Plan
May 3	Present changes to HAB Board
May 15	Final CRP draft ready for public comment
June 3	45-day comment period starts
July 11-12	Formal HAB Advice to TPA agencies on CRP
July 17	Comment period ends
September	Adopt Final CRP



April 9, 1996

Ms. Karen Randolph
U.S. Department of Energy
Richland Operations Office
825 Jadwin Avenue
Richland, WA 99352

SUBJECT: Revision of the Tri-Party Agreement Community Relations Plan

Dear Ms. Randolph:

Enclosed is a revised draft of the Hanford Federal Facility Agreement and Consent Order Community Relations Plan (CRP). The draft includes many comments received from the U.S. Department of Energy and has been agreed to by the Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA). We are mailing it to you in accordance with the provisions of the Tri-Party Agreement's Section XLII.

This draft will represent the first CRP update since 1993 and will take important steps forward to involve the public in the Hanford budget preparations. In addition, the draft will streamline public involvement actions involving work plans, feasibility studies and remedial investigations, making public involvement more efficient and cost effective.

Ecology and EPA believe it is important to conduct a public review of the draft CRP to ensure public comments and values are included in the final CRP. Since the Hanford Advisory Board's special ad hoc committee requested to see a draft CRP last November, we consider it vital to act at the earliest date possible to resolve any outstanding issues in the draft CRP. Ecology and EPA would like to schedule a conference call with members of the ad hoc committee during the week of April 22. We will be contacting each committee member to determine their availability during that week. EPA and Ecology would like to meet with USDOE prior to the conference call to discuss any outstanding issues. Please contact Laurie Davies with Ecology at (360) 407-7113 or Dennis Faulk with EPA (509) 376-8631 to schedule a meeting.

Sincerely,

Michael A. Wilson, Manager
Nuclear Waste Program
Department of Ecology

Doug Sherwood, Manager
EPA Hanford Project Office

DRAFT

Planning/Budget Integration Cycle

Requirements/guidance

- DOE & DOE-EM directives
 - Strategic plans
 - Success indicators/performance measures
 - Complex wide prioritization
- TPA - 148/149 and community relations plan
- Budget guidance

CFO functions

- Planning
 - HST, HSP, MDD
 - MYPP
 - Prioritization/IPL
 - Success indicators/performance measures
- Budget
 - ADS, RDS
 - Congressional budget year
 - Execution year

Customers

- Internal
 - Site employees
 - DOE-HQ
- External
 - EPA
 - Ecology
 - Ecology
 - DNFSB
 - Congress

Stakeholders

- Tribal Nations
- HAB
- Local/state governments
- Other interest groups

Process/cycle

- Strategic planning cycle
 - HST/HSP/MDD
 - Prioritization
 - Success indicators/performance measures
- Budget cycle
 - Congressional budget year
 - Execution year
- Assure dialogue
 - Inter-program -- eliminate stovepipe
 - Internal/external -- customers/stakeholders
- Facilitate/integrate
 - Assure high customer/stakeholder priorities identified
 - Identify/resolve disconnects
 - Bring closure to customer/stakeholder issues
 - Resolve high priority issues
 - Feedback on management decisions and results

Outputs

- Products with customer/stakeholder buy in
 - HSP/MDD
 - MYPPs
 - Mission performance plan
 - BEMR
 - IPL
 - ADS/RDS
 - Congressional budget year
 - Execution budget year

Outcomes

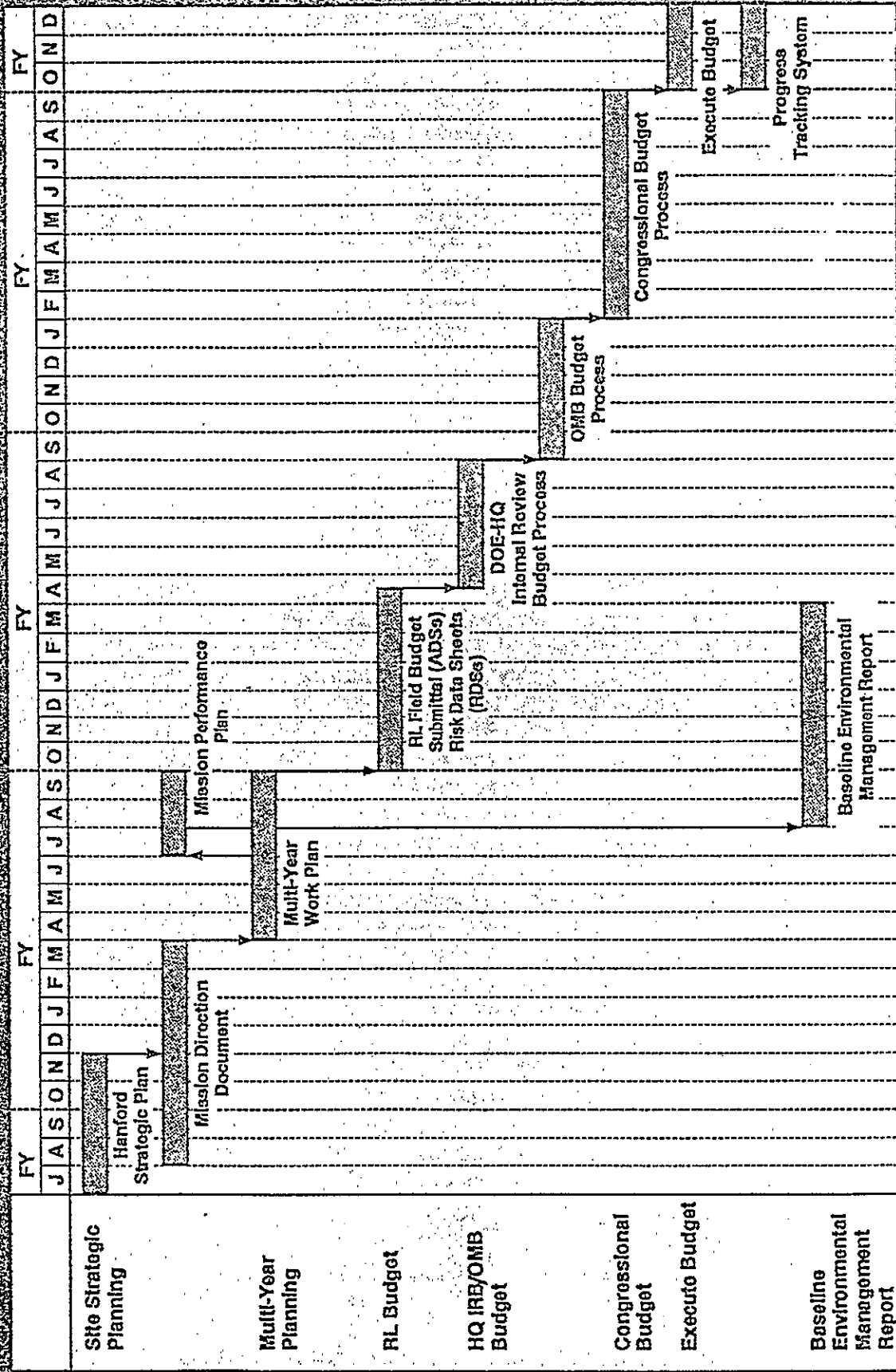
Enhances the quality of decisions affecting Hanford made by RL senior management

Ensures DOE managers are well prepared for decision making:

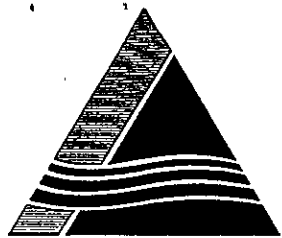
- Permits more productive relations with customers/stakeholders
 - Enable identification/resolution of problems early in the planning cycle
 - Allows DOE to enter into a more pro-active dialogue with customers/stakeholders in a timely fashion
 - Permits better understanding of each others (DOE & customers/stakeholders) needs, values, deadlines, roles, and responsibilities
 - Helps affect customer/stakeholder buy in on DOE products before public issuance of major DOE decisions
 - Effects feedback on major issues before they become public
- Allows more efficient utilization of limited resources
 - Makes more effective use of customer/stakeholder involvement through integration of DOE and customer/stakeholder meeting calendars
 - Moves customer/stakeholder discussions to a higher plane by emphasizing "big picture" perspective of DOE management decisions.

Ensures customers and stakeholders are consistently and proactively on board with fully integrated planning assumptions, guidance and results

DOE Planning/Budget Process Flow



43888



Tri-Party Agreement

April 23, 1996

AGREEMENT TO POSTPONE THE APRIL 1996 TANK WASTE REMEDIATION SYSTEM HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONE REVIEW

The Hanford Federal Facility Agreement and Consent Order (Agreement) specifies in Article XLVIII, Paragraph 149.I.4. the conduct of a "monthly milestone review meeting". These meetings have been held on a monthly basis reviewing one third of the established milestones in the Agreement. The Tank Waste Remediation System (TWRS) milestones were scheduled to be reviewed in April 1996.

On April 24, 25, and 26, 1996 the TWRS Management team from the U.S. Department of Energy, Richland Operations Office (RL), Washington State Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (USEPA) will be attending a Partnering Workshop designed to enhance communication abilities and the TWRS program mission and objectives. In light of this workshop and other meetings which have taken place recently, RL and Ecology consider it redundant to hold the TWRS Quarterly Milestone Review in April 1996 on TWRS issues and progress. Therefore, the requirements of Article XLVIII, Paragraph 149.I.4. related to "monthly milestone review meetings" are considered met for April 1996.

James E. Rasmussen
Director, Environmental Assurance,
Permits and Policy Division
U.S. Department of Energy
Richland Operations Office

Michael A. Wilson
Manager, Nuclear Waste Program
State of Washington
Department of Ecology

Douglas R. Sherwood
Project Manager,
Hanford Project Office
U.S. Environmental Protection
Agency, Region X

cc: L. D. Arnold, WHC
C. C. Haass, DOE
J. E. Kinzer, DOE
T. M. Michelena, Ecology
G. H. Sanders, DOE
D. R. Sherwood, EPA
Administrative Record

Change Number M-26-96-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date April 11, 1996
Originator M. A. Selby		Phone (509)736-3021
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Revise Tritium Treatment Technology Report Submittal Schedule to Biennial.		
Description/Justification of Change <p>Interim Milestone M-26-05 is currently stated as follows:</p> <p><u>M-26-05</u> <u>Commencing August 1994 and annually thereafter:</u></p> <p>Submit to EPA and Ecology an evaluation of development status of tritium treatment technology that would be pertinent to the cleanup and management of tritiated waste water (e.g., the 242-A Evaporator Process Condensate liquid effluent) and tritium contaminated groundwater at the Hanford Site.</p> <p>Change Interim Milestone M-26-05 submittal schedule as follows:</p> <p><u>M-26-05</u> <u>Commencing August 1997 and biennially thereafter:</u></p> <p>Submit to EPA and Ecology an evaluation of development status of tritium treatment technology that would be pertinent to the cleanup and management of tritiated waste water (e.g., the 242-A Evaporator Process Condensate liquid effluent) and tritium contaminated groundwater at the Hanford Site.</p> <p>(cont.)</p>		
Impact of Change <p>There is no environmental impact due to this change. Submittals of the tritium technology report will be made every other year, with the next report due in August 1997. There will be no submittal in August 1996.</p>		
Affected Documents <p>Hanford Federal Facility Agreement and Consent Order, Appendix D, Work Plan.</p>		
Approvals		
<i>CA Hammen</i> DOE	<u>4/23/96</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<i>Douglas R. Shewell</i> EPA	<u>4/23/96</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<i>Michael A. Wil</i> Ecology	<u>4/23/96</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved

Hanford Federal Facility Agreement and Consent Order
Change Control Form M-26-96-01
Page 2 of 2

Description/Justification (cont.)

Tritium treatment technology evaluation reports were submitted in 1994 and 1995. The pace of tritium technology advancement does not justify submittal of a report every year. Changing to a biennial submittal will adequately reflect the pace of tritium technology advancement and will be more cost effective.

43892

Change Number M-15-96-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date April 9, 1996
Originator Bob Stewart - DOE; Larry Gadbois - EPA; Dave Holland - Ecology		Phone
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Modification to Due Dates for Milestones M-15-80, M-15-80C-T01, M-15-80A, and M-15-80B, under the Columbia River Comprehensive Impact Assessment (CRCIA).		
Description/Justification of Change <p>Based on consensus of the CRCIA Management Team (described on Page 3), several project terms have been clarified as follows: [scoping level risk assessment] has become [screening assessment] and the screening assessment plus comprehensive definition (also formerly referred to as "FY 1996 work") has been termed [Phase 1 work]. Also the dates of the milestones below are rescheduled as indicated:</p> <p>Note: wording changes to milestones/target dates are displayed as shaded text to show new text and strikeout text to show deleted text.</p> <p>M-15-80 <i>Submit for review to EPA, Ecology, Technical Peer Reviewers, CRCIA Team, and the public for review a draft interim report (considered an initial Scoping Screening Assessment Report for the "Columbia River Comprehensive Impact Assessment" by the CRCIA Team) which incorporates human health and ecological risk assessments and documents completion of the Agreed to FY 1996 work Phase 1 work detailed on page 34, items #1 and 4 and 5.</i> Existing Due Date: July 31, 1996 Revised Due Date: December 19, 1996</p> <p style="text-align: center;">- Continued on Page 2 -</p>		
Impact of Change Additional budget will be required in FY 1996 and FY 1997 to complete the scope of work above under the present mode of operation. There may be future budget impacts because development of M-15-80B recommendations and execution of work required for a comprehensive assessment are not in the current budget plan.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Appendix D.		
Approvals		
<i>CA Hansen</i> DOE	<i>4/23/96</i> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<i>Douglas R. Howard</i> EPA	<i>4/23/96</i> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<i>Michael P. Wil</i> Ecology	<i>4/23/96</i> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved

April 9, 1996

Description/Justification (Continued)

M-15-80-T01 Submit a revised report of the draft from M-15-80 which incorporates responses to comments from the CRCIA Team, Technical Peer Reviewers and the public. Responses are to be based on consensus of the CRCIA Team to the extent practicable; to the extent that comments cannot be reconciled, "minority opinions" will be included.
Existing Target Date: Oct 31, 1996
Revised Target Date: April 30, 1997

M-15-80A DOE is to provide a list of comprehensive work scope tasks developed and prioritized in coordination with the CRCIA Management Team (not based on funding).
Existing Due Date: Sept 30, 1996
Revised Due Date: February 28, 1997

M-15-80B DOE is to provide a recommendation for follow-on work to M-15-80, primarily based on M-15-80A, as well as funding considerations, overall Sitewide objectives, and TPA authority. This will include future milestones.
Existing Due Date: Dec 31, 1996
Revised Due Date: June 30, 1997

The following target date is added:

M-15-80B-T01 DOE is to provide to EPA and Ecology an initial recommendation for CRCIA "next phase(s)" budgeted work to be used as input into the FY 1999 budget submission (to include recommendations for FY 1998). Recommendations are to be based on CRCIA workscope prioritization discussions with the CRCIA Team.
Target Date: January 10, 1997

Justification for Schedule Change:

The current schedule was based on predefined constraints and limited knowledge of the schedule requirements of working with the CRCIA Team. In general, this schedule required that much of the technical work be performed in parallel with insufficient time for CRCIA Team input and little additional time for revision of technical work based on Technical Peer Reviewer, CRCIA Team, and other comments. Experience has now shown that time scheduled is insufficient based on the continuing depth of CRCIA Team involvement and the large number of comments received. The following specific delays and/or decisions have impacted the overall schedule:

- reaching agreement on key data decisions such as corridor width for data collection, river segmentation, and process for obtaining representative values for each data source within each of the segments
- receiving data
- reevaluating the contaminants with revised screens based on comments received on the contaminants report
- reaching agreement on assessment methodologies including deterministic and stochastic data input

Description/Justification (Continued)

Remaining scheduled activities have been revised to allow for the following:

- extended involvement with the CRCIA Team, reflecting conduct of business in existing forum with team interaction and consensus decision making
- incorporating reader friendliness into compilation report per technical peer review comments and CRCIA Team agreement
- extended involvement in the CRCIA Team comprehensive chapter development
- limited revision of risk assessments per data review comments

Background:

For years, appropriate scope and priority for assessments of contaminant impacts to the Columbia River have been controversial. During 1993 the Tri-Parties began work towards a Columbia River Comprehensive Impact Assessment. This effort was established in the Tri-Party Agreement in January 1994. Differences in project participants' expectations are at least partially attributable to the word "comprehensive" in the CRCIA project name and to the description of the project scope for the original M-13-80B milestone. To help establish common expectations, a CRCIA Project Management Team was formed in late August 1995, consisting of the following organizations and representatives:

- (Chair) U. S. Department of Energy, CRCIA Project Manager
- U. S. Environmental Protection Agency, CRCIA Project Manager
- State of Washington, Dept. of Ecology, CRCIA Project Manager
- Yakama Indian Nation, CRCIA Representative
- Confederated Tribes of the Umatilla Indian Reservation, CRCIA Representative
- Nez Perce Tribe, CRCIA Representative
- State of Oregon, CRCIA Representative
- Hanford Advisory Board, CRCIA Representative
- Primary Contractor, CRCIA Project Manager,
CRCIA Team Administrator
- Environmental Restoration Contractor, CRCIA Technical
Coordination Representative,
Public Involvement Representative
- General Services Support Contractor - Technical Support Representative

This team began meeting in late August 1995 and continues to meet, nominally 1/2 day per week, but as much as a full day per week, to resolve issues associated with the project. An agreement concerning the scope of the project was agreed-to and signed by CRCIA Team members on October 3, 1995. This agreement is restated on page 4 as "Phase 1 Work" and is part of the revised M-15-80 milestone.

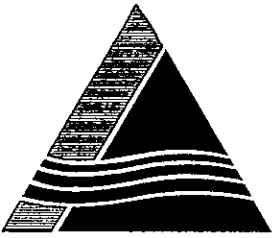
Description/Justification (Continued)

Phase 1 Work

The following work, with proactive involvement by the non-TPA members, will be performed in response to TPA Milestone M-15-80:

- 1) Perform an assessment of Hanford-derived contaminants (existing conditions including residual contaminants from past operations) in a screening assessment to support IRM decisions.
- 2) Compile and make available to the public the approximately 2000 documents identified in Appendix A of the data compendium; pertinent supporting Hanford data will be made available.
- 3) Work with the declassification efforts of the HAB in identifying the Columbia River documents as a high priority for release.
- 4) Define the essential work remaining to provide an acceptable "comprehensive" river impact assessment. This work will be documented in the same report as the screening assessment.
- 5) Data (from 2&3) will be available for reconciliation against the screening assessment.

These actions are designed to fulfill the requirements for a screening assessment to support IRM decisions limited only by the time and FY 1996 funds available for this effort. However, the "comprehensiveness" issue is left open. Work identified under #4 will be assigned TPA milestones as appropriate, scoped, prioritized and scheduled.

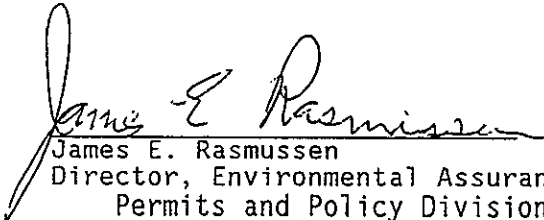
**Tri-Party Agreement**

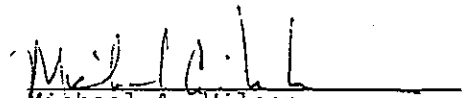
April 23, 1996

THIRD THIRTY DAY EXTENSION TO DISPUTE RESOLUTION FOR HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE REQUEST M-41-96-01

Change Request M-41-96-01, concerning M-41-09 Interim Milestone, "Start Interim Stabilization of 7 Non-Watch list Tanks in 241-S Tank Farm" is in the dispute resolution process of the Hanford Federal Facility Agreement and Consent Order. The dispute has been extended for sixty days for continued discussion at the Project Manager level. The current extension will expire on May 6, 1996.

The end of the period during which the Project Managers will seek resolution of the dispute is hereby extended an additional thirty (30) days, from May 6, 1996 to June 5, 1996.


James E. Rasmussen
Director, Environmental Assurance,
Permits and Policy Division
U.S. Department of Energy
Richland Operations Office


Michael A. Wilson
Manager, Nuclear Waste Program
State of Washington
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cc:L. D. Arnold, WHC
J. W. Donnelly, Ecology
C. C. Haass, DOE
D. E. Jackson, DOE
J. E. Kinzer, DOE
T. M. Michelena, Ecology
G. H. Sanders, DOE
D. R. Sherwood, EPA
Administrative Record



CODE OF ACCOUNTS

Presentation to Ecology & EPA

April 23, 1996

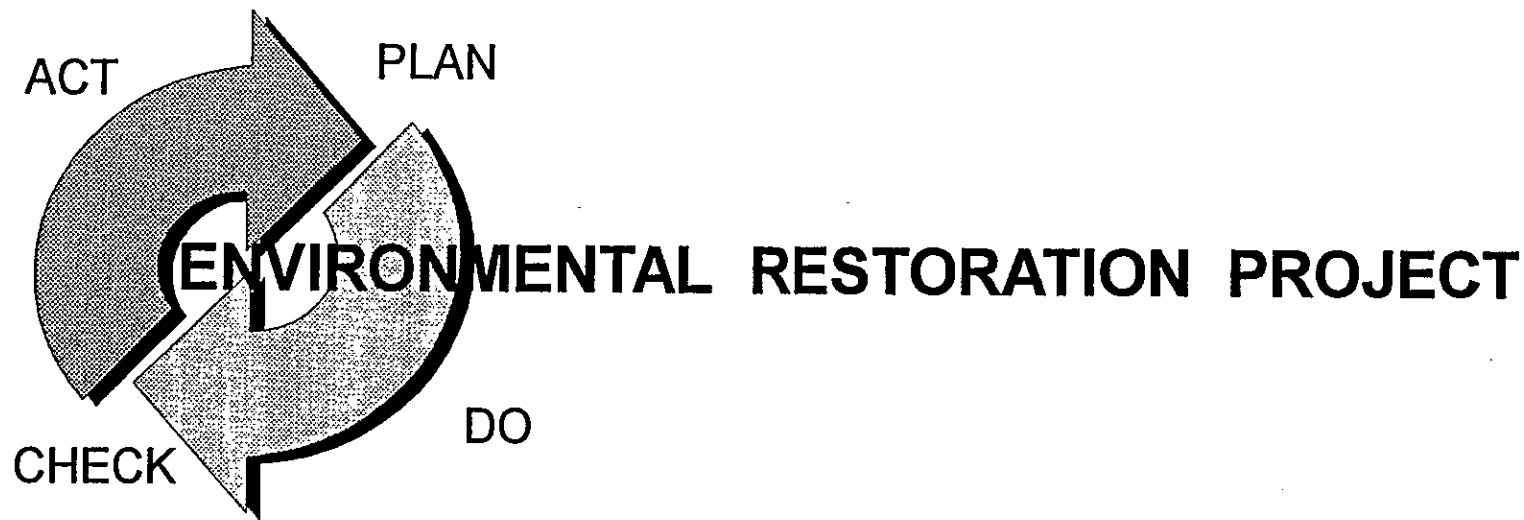


The Problem:



The current cost collection system makes it difficult to:

- 1. Track project costs in a structured manner**
- 2. Compare like costs from various sites**
- 3. Quickly analyze areas of difference**
- 4. Estimates prepared different from the way cost is collected**



Our Goal:

Develop a collection approach that provides:

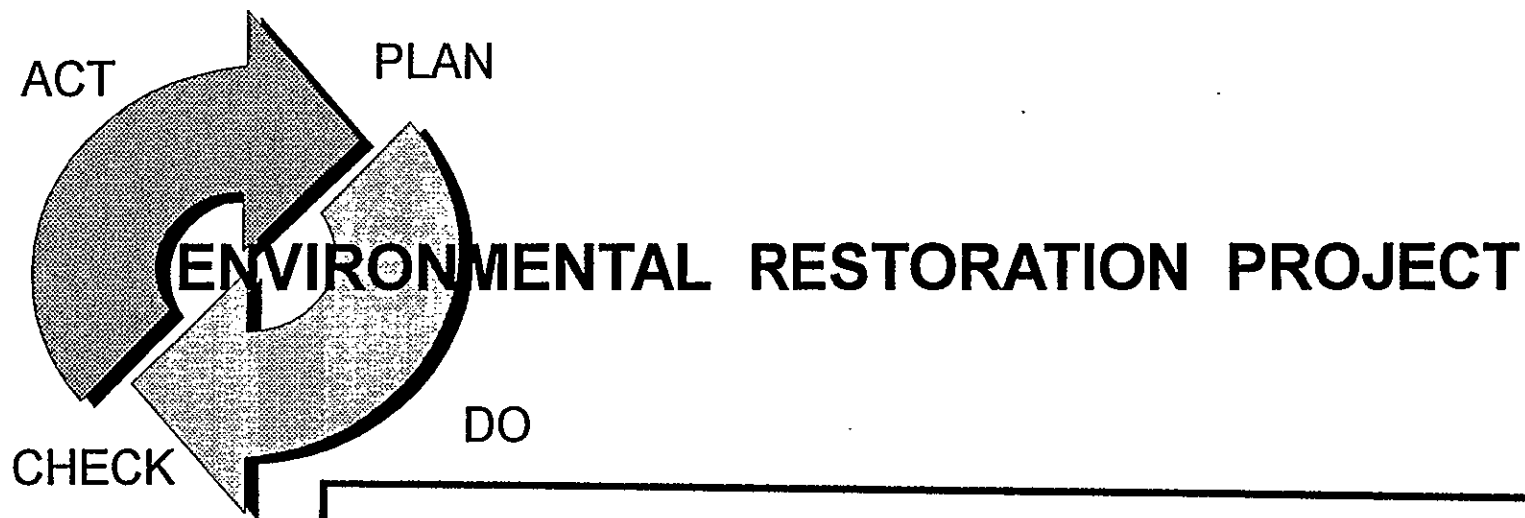
- 1. For a logical categorization of costs across sites**
- 2. The capability to compare costs to other sites, locally and nationally**
- 3. A basis for estimating future costs**
- 4. A basis for benchmarking**
- 5. A more effective basis for performance monitoring**



The Hazardous, Toxic and Radiological Waste Work Breakdown Structure (HTRW WBS)

- 1. Provides a uniform work breakdown structure and and cost collection basis**
- 2. Recognized as the government standard.**

- Adopted as standard by USACE, Navy, AFCEE, EPA and DOE.**



Cost Collection

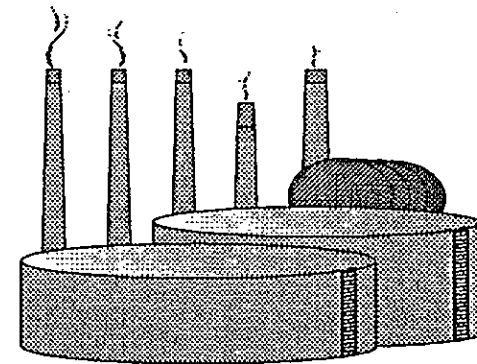
Examples of Work Op - HTRW WBS Tie:

<u>Work Op</u>	<u>Description</u>	<u>HTRW</u>
2910	Lab Chem Analysis, Air Hygiene	33.02.09.01
8510	Solids Collection, Cap, Gas Collection Layer	33.08.05.01
85L0	Solids Collection, Cap, Paving Cover	33.08.05.20
H210	D&D, Facility Shutdown, Facility Preparation	33.17.02.01.
H4G0	D&D, Dismantling, Hazardous Material Rem	33.17.04.16.
M6W0	Demob, Post Construction, Final Report	33.21.06.91



Taking the HTRW WBS further:

- 1. Budget and track to site**
- 2. Compare like sites via attributes**
- 3. Review work operations**

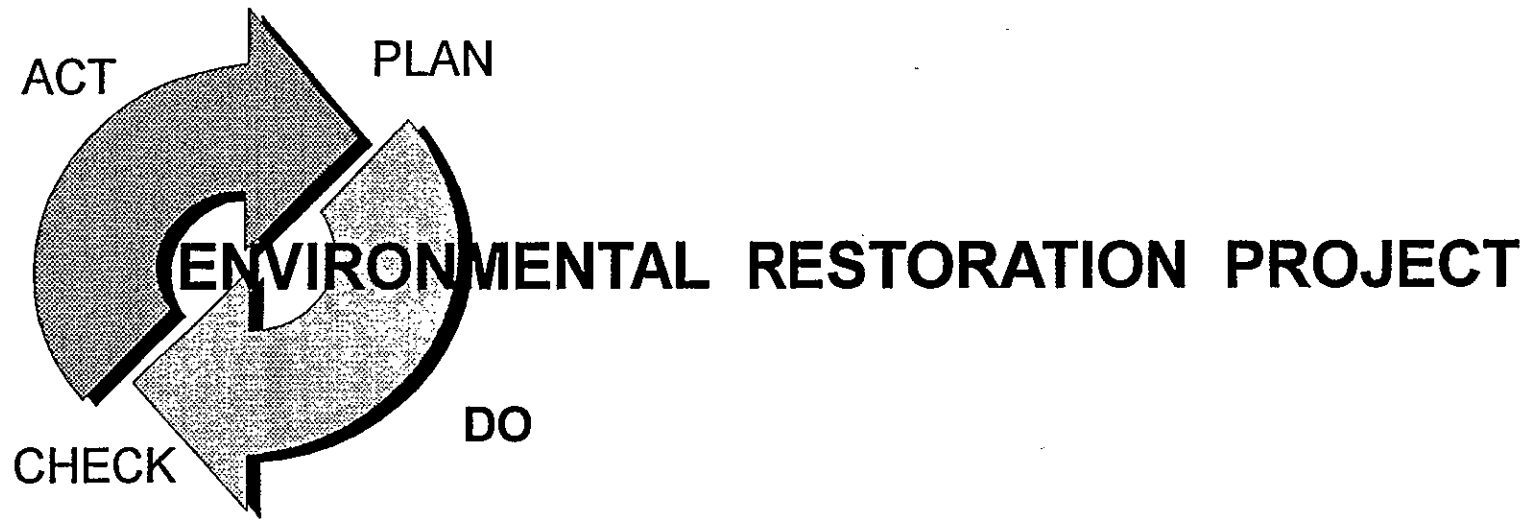


Site



Plan:

- 1. Structured / disciplined approach**
- 2. Identification of "site attributes"**
- 3. Solid budget / work plan foundation**



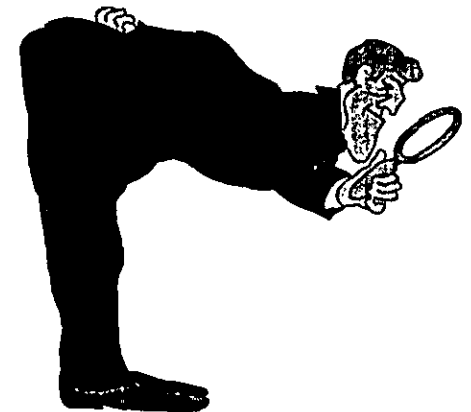
Do:

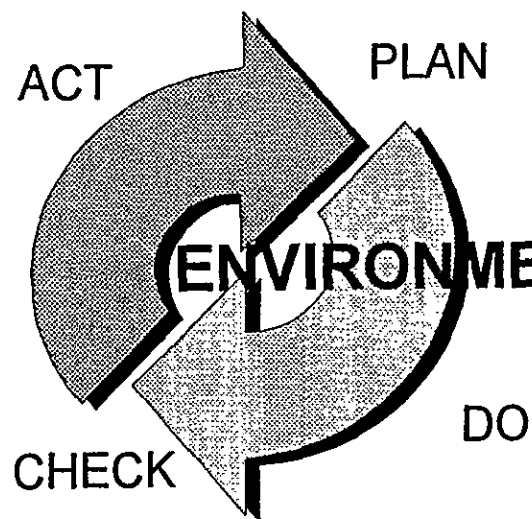
- 1. Execution of the work in accordance with the plan**
- 2. Report costs per the code of accounts**
- 3. Report performance**



Check:

- 1. Performance +/-**
- 2. Effectiveness of previous work operation adjustments on performance**
- 3. Identification of improvement areas**
- 4. Comparisons of like work efforts**





ENVIRONMENTAL RESTORATION PROJECT

Example of cost analysis possible:

<u>Site (Common Type)</u>	<u>1st</u>	<u>2nd</u>	<u>3rd</u>	<u>...</u>	<u>n th</u>
Total Cost/cy	75.00	80.00	82.00	Why??	

Detail Analysis

Sampling & Analysis/cy	10.00	10.00	10.00	
Excavation/cy	15.00	14.50	14.00	
Transport/cy	10.00	<u>13.00</u>	<u>16.00</u>	Action
Other/cy	XXX	XXX	XXX	



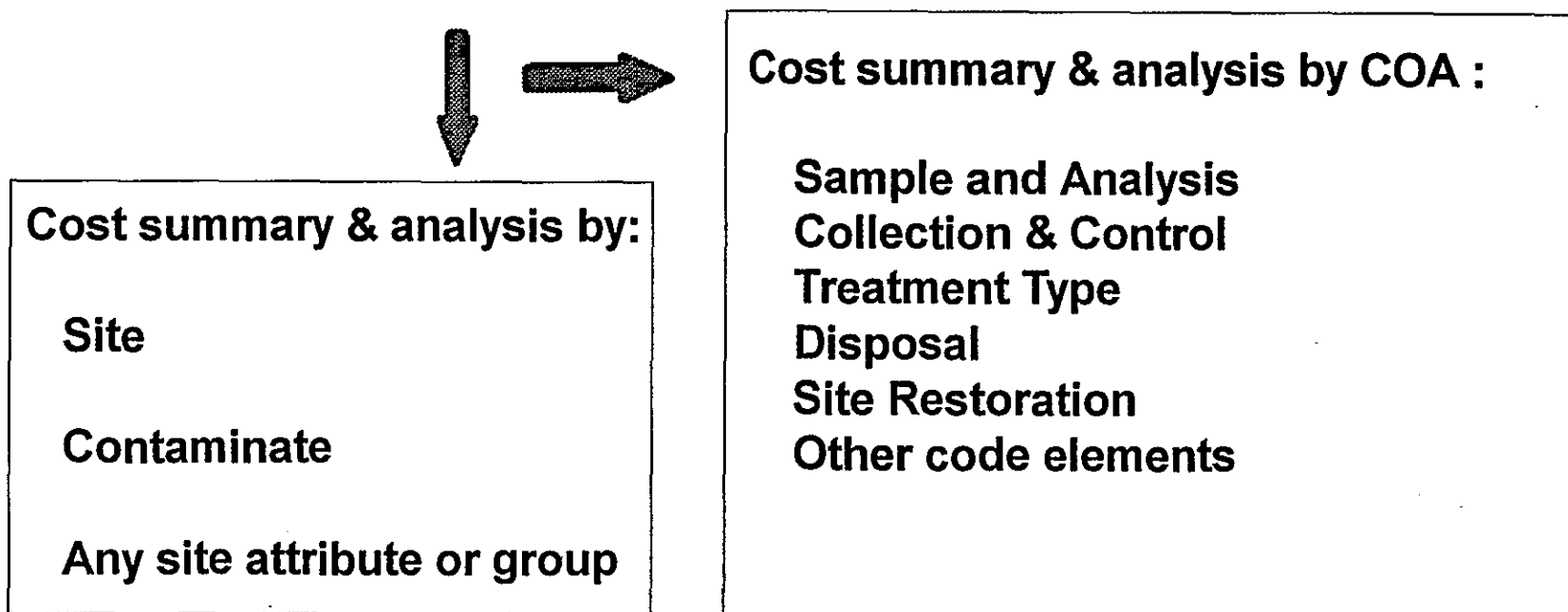
Act:

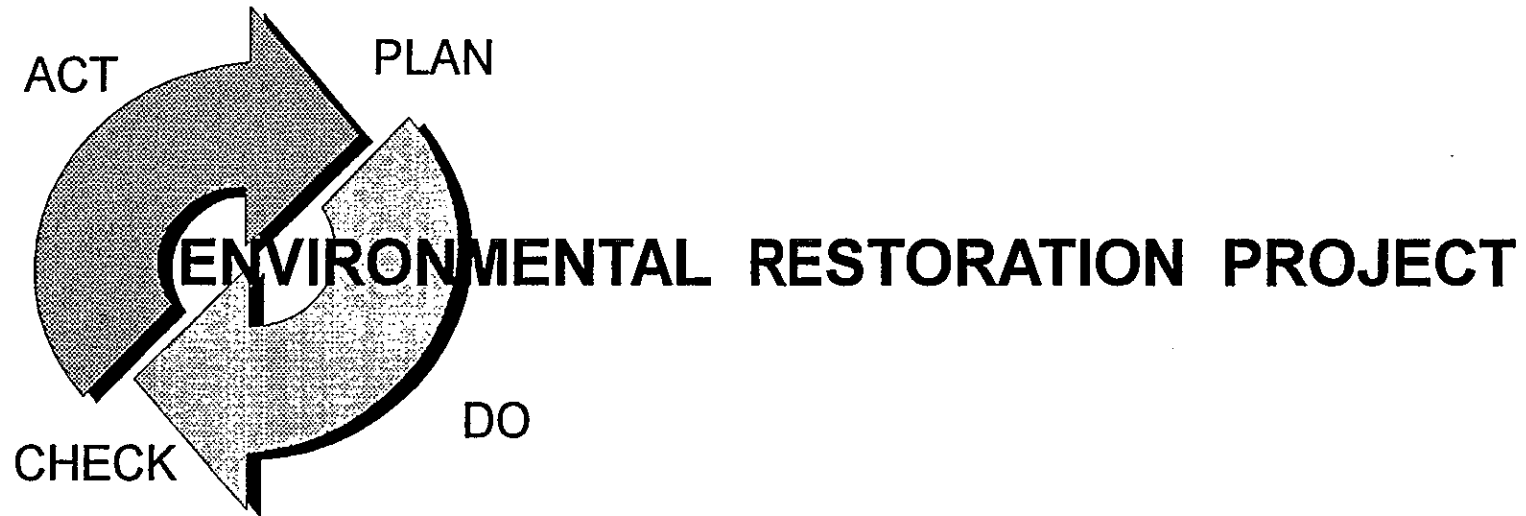
- 1. Adjust execution approach to improve performance**
- 2. Incorporate feedback into future work estimating cost models**





Using the code of accounts to collect costs will permit:





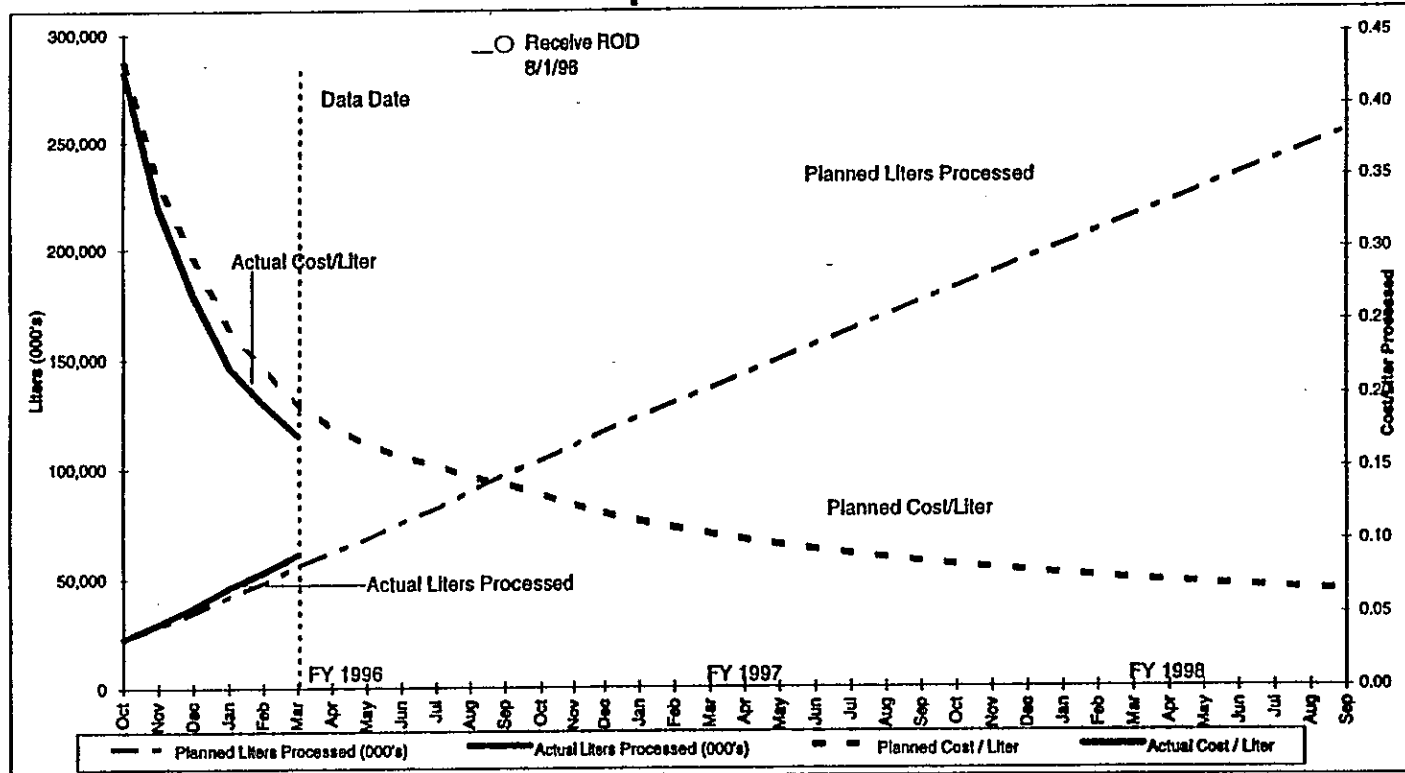
Project Metrics



Project Performance Metrics:

- 1. All in cost per loose cubic meter in ERDF**
- 2. Remediation cost per loose cubic meter @ site**
- 3. Samples per 100 contaminated loose cubic meter**
- 4. Cost per sample**
- 5. P&T unit costs all in 200-UP-1, 200-ZP-1, 100-HR-3, 100-NR-2**
- 6. Indirect cost ratio**

Groundwater Management Production Metric 200-UP-1 Operable Unit



Note: FY 1997 and FY 1998 Budgets Reflect ADS Guidance Issued 3/8/98. Actual Costs exclude Performance Fee
Includes all Level 1 (32-Preliminary Assessment & 33-Remedial Action) Cost (Actual & Forecast) & Production Associated for site code 20UP1 (200-UP-1)

DRAFT

